

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the matter of:

United States of America

v.

Chad Owens

48 W South Street

Worthington, OH 43085

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Case No.: 2:25-mj-268

Magistrate Judge Vascura

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Matthew W. Guinn, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state:

INTRODUCTION AND BACKGROUND

1. I, Special Agent Matt Guinn (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422(b) – advertising/solicitation for/or, sexual exploitation of a minor and distribution/receipt/possession of visual depictions of minors engaged in sexually explicit conduct (hereinafter “child pornography”) as well as 18 U.S.C. § 1519 – Destruction of Evidence in a Federal Investigation. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Chad Owens (OWENS) committed the violations listed above.
2. I am a Special Agent (SA) with the FBI and have been since April 2012. I am currently assigned to the Child Exploitation and Human Trafficking Task Force Crimes Against Children Squad, Cincinnati Division, Columbus Resident Agency. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children.
3. During my career as a SA, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have received both formal and informal training in the detection and investigation of computer-related offenses involving children. As part of my duties as a SA, I investigate criminal violations relating to child exploitation and child pornography, including the online enticement of minors and the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A.

PROBABLE CAUSE

4. On or about November 7, 2024, a North Texas Internet Crimes Against Children Task Force Officer (TFO) received and reviewed two separate CyberTipLine reports from the National Center of Missing and Exploited Children (NCMEC). Both CyberTipLine reports, labeled as report #196510366 and #194635916, were generated based off the presence of child pornography via Instagram from what appeared to be the same user who had been both uploading and distributing out child sexual abuse material (CSAM). A total of 27 files from CyberTipLine #196510366 were flagged as child pornography and a total of 14 files were flagged as child pornography from CyberTipline #194635916.
5. During the Texas investigation, a portion of those files were reviewed by the TFO who confirmed they depicted child pornography. During the course of the investigation, the subscriber and user of that account was identified as Target One¹. Law enforcement eventually executed search warrants at Target One's residence and, in an interview with Target One, he admitted to being involved in the possession and sharing of child pornography for approximately four years.
6. The investigation also revealed that Target One had been producing child pornography as well of two minors that he had access to (MV1 and MV2) who were approximately ten and twelve years of age and that the content depicted him masturbating and digitally penetrating the vagina of the two minor females with his fingers. Target One admitted to sharing child pornography he created of the victims to around a dozen different people online and communicating with others about his desire to engage in further sexual abuse of the victim(s).
7. A search warrant for the Instagram account of Target One was obtained during the course of the Texas investigation for his account. Return results revealed numerous images and videos of child sexual abuse material and approximately thirty-five conversations between Target One's account and other Instagram users about child exploitation related topics.
8. One of those conversations between Target One and another Instagram user, "Joe Miller," now known to be Chad OWENS, was flagged by Texas law enforcement. In that conversation, the child pornography that Target One created had been sent to OWENS. In the messages between the two accounts, Target One and OWENS spoke about sexually abusing the Texas victims in this case. OWENS stated he was masturbating while talking about having sexual intercourse with the victim(s) as well.
9. In March 2025, your affiant received information from FBI Dallas Division regarding OWENS Instagram account. After Texas authorities learned OWENS resided in the Southern District of Ohio, the lead was forwarded here. Upon receipt of the information, your affiant reviewed the conversation between Target One and OWENS occurring in July 2024, and noted the following:

OWENS:

How old is she

¹ The real name of the target is known to law enforcement but has been redacted here for purposes of protecting the integrity of the investigation.

OWENS:	I want to fuck her
OWENS:	I'm jacking off
Target One:	She is 8, no I don't fuck them just masturbate over them when they're sleeping
Target One:	[11 second video of a prepubescent female distributed which depicted the minor female in underwear and te-shirt]
OWENS:	Oh my god that is so hot
OWENS:	Anything with her naked
OWENS:	I'm jacking off to this
OWENS:	It would be tough not to rape her
Target One:	It is but we have to appreciate what we can get
Target One:	If you get telegram I can send you better vids of her
Target One:	I have her kitty in one of them
Target One:	I'd prolly get banned if I sent it on her
Target One:	Here*
OWENS:	Just send it here
OWENS:	God I want to fuck her
Target One:	No
OWENS:	Have you ever blew your load on her?
Target One:	Yes
Target One:	On her face
Target One:	I have a video of that too
OWENS:	Show me
OWENS:	Do you drug her?
OWENS:	Has she sucked your cock?
Target One:	No I don't one of them is a heavy sleeper and the other just sleeps like that sometimes
Target One::	No I only take advantage of them when they're sleeping
Target One::	[47 second video distributed which depicted a hand sliding underwear to the side showing a prepubescent female. The focus moves to show a sleeping prepubescent female. Saliva is shown falling on the vagina and a finger touching the saliva and vagina.
Target One::	[22 second video distributed which depicted a hand sliding underwear to the side showing a prepubescent vagina. The hand spreads the labia of the vagina and the focus of the video shows a sleeping prepubescent female.]
Target One:	Yes but no video of that
Target One:	[15 second video distributed which depicted a man masturbating over a sleeping prepubescent female. The man appears to ejaculate on the female.]
OWENS:	Fuck yes
OWENS:	Have you tasted her pussy?

Target One: After that video where I spit on her I got my hand deeper in her while I jacking off and I tasted her yes, she's really sweet

10. The original CyberTipline reports included information on OWENS account as a recipient. This information included a phone number registered to OWENS account which was listed as (614) 599-1855 and the CyberTipLine report further indicated this number was verified. The CyberTipLine report also listed an IP address 174.101.227.193 as associated to OWENS Instagram account.
11. Law enforcement learned OWENS account IP address was resolved to Verizon and Charter Communications. In response to a subpoena, Verizon verified that OWENS was the subscriber on the account.
12. On or about March 25, 2025, your obtained and served a federal search warrant on Meta Platforms for OWENS Instagram account. The response records were reviewed by your affiant. In those records, the above noted conversations with Target One were located in OWENS Instagram account. In addition, your affiant noted another conversation with Instagram used amelia_ella419 where OWENS asked several times if she had kids. OWENS also expressed an interest in engaging in sexual activity with ameila_ella419 then stated the following:

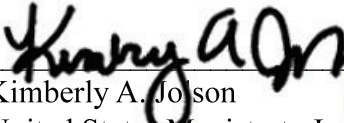
OWENS:	Do you have any kids
amelia_ella419:	Oh ok but trying too snap me your pic now
OWENS:	I wish you were younger
OWENS:	I'm jacking off now
OWENS:	I wish you had a daughter

13. On or about April 16, 2025, a federal search warrant was executed at the residence of OWENS located in Columbus, OH. Law enforcement was authorized pursuant to this warrant to search for and seize all digital media devices of OWENS. OWENS was not on scene at the time, so law enforcement called his telephone number and sent him messages to his telephone number indicating who they were and asking him to meet to obtain his cellular device.
14. The investigation revealed that OWENS then went to a bar with his device, and per surveillance footage at that bar, had his device on him at all times. The video surveillance revealed that he left the bar after a few hours, knowing that the FBI was attempting to locate him and seize his phone, with his phone in hand. Agents later learned that the phone was destroyed and are still investigating the circumstances surrounding that destruction.
15. Based upon the foregoing, your affiant submits that there is probable cause to believe that OWENS has committed violations of 18 U.S.C. §§ 2251, 2252, 2252A, advertising/solicitation for/or, sexual exploitation of a minor and receipt/possession of visual depictions of minors engaged in sexually explicit conduct (hereinafter "child pornography") as well as 18 U.S.C. § 1519 – Destruction of Evidence in a Federal Investigation. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.



Matthew W. Guinn
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 8th day of May, 2025.



Kimberly A. Johnson
United States Magistrate Judge

